

MILMAN LABUDA LAW GROUP PLLC

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February 6, 2023

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Pamela K. Chen, U.S.D.J.
225 Cadman Plaza East
Courtroom 4F North
Brooklyn, NY 11201-1804

Re: IME WatchDog, Inc. v. Gelardi, *et al.*
Case No.: 1:22-cv-1032 (PKC) (JRC)
MLLG File No.: 25-2022

Dear Judge Chen:

This office represents the Plaintiff IME WatchDog, Inc. (“Plaintiff”) in the above-referenced case. Plaintiff writes pursuant to ¶ 3(D) of this Court’s Individual Practices and Rules (hereinafter “Practices”) to submit a copy of the cover letter setting forth who your undersigned represents and the papers being served in opposition to Defendants Safa Abdulrahman Gelardi and IME Companions LLC’s motion to dismiss the defamation claim.

The papers served are:

- Plaintiff’s Notice of Cross-Motion for Leave to Amend the Complaint;
- Plaintiff’s Memorandum of Law in Opposition to Defendant’s Motion to Dismiss and in Support of Plaintiff’s Cross-Motion for Leave to Amend the Complaint;
- Declaration of Emanuel Kataev, Esq. in Support of Plaintiff’s Cross-Motion for Leave to Amend the Complaint;
 - Exhibit A – copy of proposed Second Amended Complaint in redline;
 - Exhibit B – copy of December 6, 2022 pre-motion conference transcript;
 - Exhibit C – copy of January 18, 2019 email with Defendants’ defamatory statements concerning Plaintiff; and
 - Exhibit D – copy of May 18, 2022 email with Defendants’ defamatory statements concerning Plaintiff.

Consistent with this Court’s Practices, Plaintiff’s motion papers are not being filed until the instant motion is fully brief.

Plaintiff thanks this honorable Court for its time and attention to this case.

Dated: Lake Success, New York
February 6, 2023

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Emanuel Kataev, Esq.

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